

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GINTER LOGISTICS SERVICE CO., LTD.,

Plaintiff,

-against-

ACH FREIGHT FORWARDING, INC., JIMIN ZHOU
a/k/a JIMMY ZHOU, XIAO JI HE d/b/a PACIFIC JIN
AN TRADING, INC. and XIN MAIO, INC.,

Defendants.
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Docket No.: 07-CIV-8677 (LAP)

**JOINT SCHEDULING
REPORT**

RULE 26(f) JOINT SCHEDULING REPORT

Pursuant to F.R.C.P. Rule 26(f), the parties have met and conferred to discuss the claims and defenses in this action and to agree on a jointly proposed discovery plan. The parties jointly submit the following report:

1. **Pre-Discovery Disclosures:** The Parties will exchange by September 15, 2008, the information required by F.R.C.P. Rule 26(a)(1).

2. **Discovery Plan:** The parties jointly propose to the Court the following discovery plan:

(a). The parties have identified the need for discovery on the following subjects:

- (i). The contracts between the parties;
- (ii). The documents in the possession of each party regarding the underlying transactions; and
- (iii). The first hand knowledge possessed by each party.

(b). In accordance with the Court's Order dated July 14, 2008, Discovery is to be completed by December 31, 2008.

- (d). Discovery demands by all parties are to be served by September 15, 2008.
- (e). All responses to Discovery demands are to be served on or before October 31, 2008.
- (f). Depositions of all parties are to be completed on or before December 1, 2008.
- (g). Expert disclosure, pursuant to Rule 26(a)(2), is to be served by December 31, 2008.
- (h). Pretrial disclosures, pursuant to Rule 26(a)(3), including Witness Lists, the designation of those witnesses whose testimony will be presented at trial by means of deposition transcript, and Exhibit Lists shall be served by the parties by January 30, 2009.

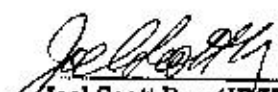
3. **Other Items:** The parties agreed upon the following:

- (a). Pursuant to the Court's Order dated July 14, 2008, any party wishing to move for summary judgment shall request leave to do so by December 31, 2008;
- (b). Pursuant to the Court's Order dated July 14, 2008, the parties shall prepare and submit a joint pre-trial order and requested *voir dire* questions and requests to charge by January 30, 2009.
- (c). Settlement is unlikely at this time.


4. The parties do not request a conference with the Court before entry of the Scheduling Order.

Dated: August 7, 2008

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